

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JIMMY LYONS, JACQUELINE LYONS,
LISA CHAMBERLIN ENGELHARDT,
GERALD COULTHURST, ENRIQUE
DOMINGUEZ, FRANCES ERVING,
JOHNNIE ERVING, ANTHONY
PAPAPIETRO, and SHEILA D. HEARD
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

LITTON LOAN SERVICING LP,
GOLDMAN SACHS GROUP, INC., ARROW
CORPORATE MEMBER HOLDINGS LLC,
SAXON MORTGAGE SERVICES, INC.,
MORGAN STANLEY, OCWEN
FINANCIAL CORPORATION, OCWEN
LOAN SERVICING, LLC, ASSURANT, INC.
(d/b/a Assurant Specialty Property),
AMERICAN SECURITY INSURANCE
COMPANY, STANDARD GUARANTY
INSURANCE COMPANY, AMERICAN
MODERN INSURANCE GROUP, and
AMERICAN MODERN HOME
INSURANCE COMPANY,

Defendants.

Case No. 1:13-cv-00513-ALC-HBP

**DECLARATION OF MELVIN A. BROSTERMAN, ESQ. IN SUPPORT OF THE
MOTION TO DISMISS BY DEFENDANTS THE GOLDMAN SACHS GROUP, INC.
AND ARROW CORPORATE MEMBER HOLDINGS LLC**

MELVIN A. BROSTERMAN hereby declares under penalty of perjury pursuant to 28
U.S.C. § 1746 as follows:

1. I am a member of the firm Stroock & Stroock & Lavan LLP, counsel for
defendants the Goldman Sachs Group, Inc. and Arrow Corporate Member Holdings LLC

(collectively, “Defendants”). I submit this declaration in support of Defendants’ motion to dismiss the Second Amended Class Action Complaint (ECF Nos. 93 & 93-1) as against Defendants.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Opinion and Order, dated March 3, 2014, in *DuMont v. Litton Loan Servicing, LP*, Case No. 12-cv-2677-ER-LMS, filed in the United States District Court, Southern District of New York.

Dated: February 20, 2015

/s/ Melvin A. Brosterman